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Counsel for the Informal Noteholder Group

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
-----X		

**OMNIBUS JOINDER OF THE INFORMAL NOTEHOLDER GROUP
TO (I) OBJECTION OF THE UNITED STATES TRUSTEE TO AMENDED
MOTION FOR APPOINTMENT OF EQUITY COMMITTEE AND
(II) OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO AMENDED MOTION FOR APPOINTMENT OF
OFFICIAL COMMITTEE OF EQUITY SECURITY HOLDERS**

TO THE HONORABLE JAMES M. PECK,
UNITED STATES BANKRUPTCY JUDGE:

The Informal Noteholder Group (the “Informal Noteholder Group”), consisting of certain unaffiliated holders of senior and subordinated notes issued by Lehman Brothers Holdings Inc. (“LBHI” and, together with its debtor affiliates, the “Debtors”), by and through its undersigned counsel, hereby files this omnibus joinder (the “Joinder”) to (i) the Objection of the United States Trustee to Amended Motion for Appointment of Equity Committee (the “Trustee Objection”) and (ii) the Objection of the Official Committee of Unsecured Creditors (the “Creditors’ Committee”) to Amended Motion for Appointment of Official Committee of Equity Security

Holders (the “Creditors’ Committee Objection” and, together with the Trustee Objection, the “Objections”). In support of this Joinder, the Informal Noteholder Group respectfully represents as follows:

JOINDER

On October 10, 2008, the United States Trustee filed the Trustee Objection. On October 13, 2008, the Creditors’ Committee filed the Creditors’ Committee Objection. The Informal Noteholder Group agrees with the legal arguments set forth in the Objections and, accordingly, files this Joinder in support of the Objections.

CONCLUSION

For all of the foregoing reasons, the Informal Noteholder Group respectfully requests that the Court (i) deny the relief requested in the Amended Motion for Appointment of Equity Committee, and (ii) grant the Informal Noteholder Group such other relief as is just, proper and equitable.

Dated: New York, New York
October 13, 2008

By: /s/ Michael S. Stamer
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